

PRODUCT PERFORMANCE/EFFICACY REVIEW

BY

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3/3/04

Date: March 3, 2004

Reviewer: George LaRocca

PM: PM 13, George LaRocca

Product Reg. No: 50404-3

Product Name: C.I.C. Residual Insecticide

Decision # 331064

DP: 293059

OPPTS Guideline: 810.3300

Chemical: permethrin 0.5%

Use pattern: RTU clothing treatment and spray on for a variety of pet and other residential uses.

Residual claim: Accepted 2 weeks. Proposed 6 weeks. No mention of the number of launderings before retreatment is necessary.

Application rate: there is a change to the directions for use: **6 oz. for one outfit**; 9 oz. for two outfits; 13.5 oz. for three outfits (propose a six week claim) from-- the accepted label which states: 3 oz. for one outfit; 6 oz. for two outfits; 9 oz. for three outfits; and 12 oz for four outfits. (2 week claim)

Note that the Invicta product EPA Reg. No. 48139-11 is a **6 oz container for treatment of one shirt; one pair of trousers and one bed net**. This product is reapplied every four weeks or after six launderings but not more than once every two weeks. (Four week claim)

The cited product EPA Reg. No. 50404-5, is a **6 oz. container of 0.5% permethrin for military treatment of one uniform and one bednet**, is applied every six weeks or after six launderings (Six week claim)

All of these products contain 0.5% permethrin and they all cited the same data.

Entomologist Recommendations:

1. It appears that the originally accepted and currently accepted 50404-3 label used half the permethrin emulsion of the other similar products. The two week claim for clothing was first accepted in 2003 but it could be argued that it is consistent with a reduced treatment rate. If the registrant wishes to increase the claim to six weeks - as they propose, the amount of rate of product application should be increased to 6 oz. per outfit. They proposed this for one outfit but then reduce the rate for up to three outfits. I do not know if data support this proposal and what rationale explain the reduction. The label should also mention the need for retreatment after the sixth laundering.